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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
MEDFORD DIVISION

UNITED STATES OF AMERICA)	
)	Case No. 01:13- po - 00002 PA
Plaintiff,)	
)	INFORMATION
v.)	
)	36 C.F.R. § 261.10(p)
WYNN LAMAR CURTIS,)	36 C.F.R. §261.11(b) and (d)
)	
Defendant.)	

THE UNITED STATES ATTORNEY CHARGES:

**COUNT 1: USING OR OCCUPYING NATIONAL FOREST LANDS WITHOUT
AN APPROVED OPERATING PLAN**

On or about October 2010 to August 2011, in the District of Oregon, defendant WYNN CURTIS did unlawfully and knowingly use or occupy National Forest System lands, the Disappointment Mining Claim, by clearing vegetation, conducting helicopter operations, storing gasoline and other property, without an approved operating plan when such authorization is required, in violation of 36 C.F.R. § 261.10(p).

COUNT 2: LEAVING REFUSE, DEBRIS, OR LITTER

On or about October 2010 to August 2011, in the District of Oregon, defendant WYNN CURTIS did unlawfully and knowingly leave refuse, debris, or litter in an exposed or unsanitary

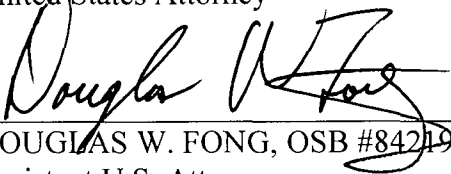
condition, and/or fail to dispose of all garbage or rubbish by removing it from the site or area, the Disappointment Mining Claim, in violation of 36 C.F.R. § 261.11(b) and (d).

**COUNT 3: USING OR OCCUPYING NATIONAL FOREST LANDS WITHOUT
AN APPROVED OPERATING PLAN**

On or about October 2010 to August 2011, in the District of Oregon, defendant WYNN CURTIS did unlawfully and knowingly use or occupy National Forest System lands, the Little House Mining Claim, by excavating, clearing vegetation, conducting helicopter operations, storing gasoline and other property, without an approved operating plan when such authorization is required, in violation of 36 C.F.R. § 261.10(p).

Dated this 23 day of July, 2013

S. AMANDA MARSHALL
United States Attorney


DOUGLAS W. FONG, OSB #84219
Assistant U.S. Attorney